

LINDA LOPEZ

Florida Bar No. 0177301

FEDERAL DEFENDERS OF SAN DIEGO, INC.

225 Broadway, Suite 900

San Diego, California 92101-5030

Telephone: (619) 234-8467

linda_lopez@fd.org

Attorneys for Mr. Vasquez-Cabrales

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

(HONORABLE WILLIAM Q. HAYES)

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAMON VASQUEZ-CABRALES,

Defendant.

) CASE NO. 08CR0972-WQH

)

) DATE: May 19, 2008

) TIME: 2:00 p.m.

)

) **NOTICE OF MOTIONS AND MOTIONS**

) **TO:**

) **1) COMPEL DISCOVERY; AND**

) **2) LEAVE TO FILE FURTHER**

) **MOTIONS**

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY, AND
JOSEPH ORABONA, ASSISTANT UNITED STATES ATTORNEY:

PLEASE TAKE NOTICE that on May 19, 2008, at 2:00 p.m., or as soon thereafter as counsel may be heard, Defendant Ramon Vasquez-Cabrales, by and through his attorneys, Linda Lopez and Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the following motions.

MOTIONS

Defendant Ramon Vasquez-Cabrales, by and through his attorneys, Linda Lopez and Federal Defenders of San Diego, Inc., moves this Court pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law, and local rules for an order:

(1) Compel discovery; and

(2) Grant leave to file further motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, the files and records in the above-captioned matter, and any and all other materials that may come to this Court's attention prior to or during the hearing of these motions.

Respectfully submitted,

Dated: April 29, 2008

/s/ Linda Lopez
LINDA LOPEZ
Federal Defenders of San Diego, Inc.
Attorneys for Mr. Vasquez-Cabrales
linda_lopez@fd.org